

Fact Sheet



For Proposed Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 17, 2010.

Permit Number: **R30-07900105-2010**
Application Received: **February 10, 2012**
Plant Identification Number: **03-54-07900105**
Permittee: **Allied Waste Sycamore Landfill, LLC**
Facility Name: **Sycamore Landfill**
Mailing Address: **4301 Sycamore Ridge Road, Hurricane, WV 25526**

Permit Action Number: *MM01* Revised: *Proposed*

Physical Location:	Hurricane, Putnam County, West Virginia
UTM Coordinates:	410.4 km Easting • 4250.3 km Northing • Zone 17
Directions:	Interstate 64 to Hurricane exit, south on WV State Route 34 for approximately 2 miles, turn right on Sycamore Landfill entrance road.

Facility Description

The Sycamore Landfill is a municipal solid waste (MSW) management facility that operates under SIC Code 4953 and has a design capacity of 6,502,932 Megagrams (Mg). The landfill accepts municipal solid waste, places it into active cells, compacts and covers it with soil. The landfill gases generated by the decomposition of the waste is collected via vertical and horizontal wells and routed to a flare where it is burned prior to being vented to the atmosphere.

Sycamore is replacing the existing flare with a new open flare system with a maximum flow rating of 1,500 scfm. The gas collection will be driven by three electric blowers controlled by a variable speed motor starter (controller). Each blower will have its own automatic block valve that open once the programmable logic controller verifies the pilot flame is present. The controller is programmed to shutdown the entire

system if there is a main flame failure, automatic block valve failure, or flame arrester high temperature. The system is to be equipped with individual thermocouples for both the pilot and main flame.

Emissions Summary

Change in Plantwide Emissions [Tons per Year]	
Regulated Pollutants	Change in Potential Emissions
Carbon Monoxide (CO)	-58.78
Nitrogen Oxides (NO _x)	+6.37
Particulate Matter (TSP/PM ₁₀)	+0.41
Volatile Organic Compounds (VOC)	-31.51
Sulfur Dioxide (SO ₂)	+9.65
Hazardous Air Pollutants (HAPs)	+0.49

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility has the potential to emit 104 TPY of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Allied Waste Sycamore Landfill, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR10	To Prevent and Control Air Pollution From the Emission of Sulfur Oxides.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources.
	45CSR16	New Stationary Sources Pursuant To 40 C.F.R. Part 60.
	45CSR23	To Prevent And Control Emissions From Municipal Solid Waste Landfills.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart WWW	NSPS for Municipal Solid Waste Landfills

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2242B	April 10, 2012	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Equipment Table Change

The MSW landfill flare, which was installed in 1998 with a design capacity of 2,250 scfm, was replaced by an elevated (open-style) flare with a design capacity of 1,500 scfm.

Boilerplate Language Update

Condition 3.5.3 was updated. The phrase "Office of Enforcement and Permits Review (3AP12)" was replaced with "Office of Air Enforcement and Compliance Assistance (3AP20)".

40 C.F.R. Part 60, Subpart WWW Requirements

As a result of the changes made with this modification, the facility's NMOC's are now below the 50 Mg trigger level for several requirements of this subpart. However, various requirements still apply when the facility NMOC's are below the 50 Mg trigger level. Previously, section 4.0 of this permit listed all applicable requirements for being above and below the trigger level. In spite of the changes at this facility, no conditions were removed from section 4.0 in case the facility exceeds this trigger level in the future.

The only changes made to section 4.0 were the removal of references to R13-2242. These permit conditions were removed from R13-2242B.

Source-Specific Requirements for the Flare

The source-specific requirements for the flare were updated for the new flare as follows:

The following existing permit conditions were revised or removed as follows:

Condition Number	Explanation of Change
5.1.1.	Previously addressed Cells 1-3. Now all landfill gas is sent to the flare.
5.1.2.	Replaced alarm with automatically closing blower blocking valves.
5.1.3.	Condition was removed, since it was removed from R13-2242B.
5.1.4.	Revised emission limits and added streamlining language for 45CSR§10-5.1.
5.1.7.	Not applicable: source is not being permitted to burn or incinerate refuse. This condition was removed.
5.1.9.	Not applicable: facility submitted application for the flare (45CSR§6-6.1). This condition was removed.
5.2.1.	The phrase "during periods of normal facility operation" was replaced with "while the flare is in operation".
5.5.1.	The word "violation" was replaced with "exceedance".

The following new permit conditions were added for the flare:

Condition Number	Description of New Condition
5.1.5.	Limits the annual amount of landfill gas routed to the flare to 788.4 MM scf per year.
5.1.6.	Requires a device/system that continuously measures and records the total amount (on a volumetric basis) of landfill gas routed to the flare.
5.2.2.	Requires records of the amount of landfill gas routed to the flare on a monthly basis and the 12-month rolling total to determine actual emissions and demonstrate compliance with 5.1.5.
5.4.2.	Requires records of when the flame was absent and blocking blower blocking valves failed to close.
5.4.3.	Requires records of visible emissions tests.
Appendix A	Visible Emission Data Sheet.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR §60.757(a)(3)	The design capacity of this facility is greater than 2.5 million megagrams and 2.5 million cubic meters. Therefore, amended design capacity reports are not required.
40 C.F.R. 63 Subpart AAAA	This facility is not a major source of HAPs, nor is it collocated with a major source. It is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m ³) but its estimated uncontrolled emissions are not equal to or greater than 50 megagrams per year (Mg/yr) NMOC. Thus this supart does not apply per 40 C.F.R. §63.1395.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The

Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.